

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
CENTRAL DIVISION

In Re:

Chapter 11

TELEXFREE, LLC ,  
TELEXFREE, INC.,  
TELEXFREE FINANCIAL, INC.,

Case No. 14-40987-MSH  
Case No. 14-40988-MSH  
Case No. 14-40989-MSH

Debtors.

Jointly Administered

**MOTION BY STEPHEN B. DARR, CHAPTER 11 TRUSTEE, TO CONDUCT RULE 2004  
EXAMINATIONS OF GLOBAL PAYROLL GATEWAY, INC., INTERNATIONAL  
PAYOUT SYSTEMS, INC., PROPAY, INC., PROPAY.COM,  
ARGUS PAYMENTS, AND ALLIED WALLET  
(Expedited Determination Requested)**

Stephen B. Darr, the duly appointed Chapter 11 trustee (the "Trustee") of the bankruptcy estates (the "Estates") of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the "Debtors"), respectfully moves for the entry of an order authorizing the Trustee to issue subpoenas upon and to obtain Documents, as defined in Exhibit "A" hereto, relating to the Debtors from PayPal, Global Payroll Gateway, Inc., International Payout Systems, Inc., Propay, Inc., Propay.com, Argus Payments, and Allied Wallet (collectively, the "Payment Processors") all in accordance with Federal Rule of Bankruptcy Procedure 2004. The services of the Payment Processors were used, on information and belief, to remit entrance fees by participating individuals to the Debtors and/or for the Debtors to remit commissions and other compensation to individuals participating in their businesses. Securing these records from the Payment Processors will aid the Trustee in his continuing investigation into the Debtors' financial affairs.

In further support of this motion, the Trustee states as follows:



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